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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
 PASSENGER SEXUAL ASSAULT  
 LITIGATION

Case No. 3:23-md-03084-CRB

This Document Relates to:

*Jane Doe LSA 340 v. Uber Technologies,  
 Inc., et al.*, 3:23-cv-01165-CRB

*H.D. v. Uber Technologies, Inc.*, et al.,  
 3:23-cv-04617-CRB

**DECLARATION OF PETER SAUERWEIN  
 IN SUPPORT OF DEFENDANTS UBER  
 TECHNOLOGIES, INC., RASIER, LLC,  
 AND RASIER-CA, LLC'S MOTION TO  
 DISMISS PLAINTIFFS' MASTER LONG-  
 FORM COMPLAINT PURSUANT TO  
 CALIFORNIA LAW**

Judge: Honorable Charles R. Breyer  
 Date: TBD  
 Time: TBD  
 Courtroom: 6 – 17th Floor

DECLARATION OF PETER SAUERWEIN IN SUPPORT OF  
 DEFENDANTS' MOTION TO DISMISS PLAINTIFFS'  
 LONG-FORM COMPLAINT PURSUANT TO CALIFORNIA LAW

Case No. 3:23-md-03084-CRB

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1 *M.F.A. v. Uber Technologies, Inc., et al.*,  
2 3:23-cv-05560-CRB  
3 *Hunter v. Uber Technologies, Inc., et al.*,  
4 3:23-cv-05622-CRB  
5 *T.R. v. Uber Technologies, Inc.*, et al., 3:23-  
6 cv-05625-CRB  
7 *J.B. v. Uber Technologies, Inc.*, et al., 3:23-  
8 cv-06692-CRB  
9 *T.M. v. Uber Technologies, Inc.*, et al.,  
10 3:23-cv-06705-CRB

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DECLARATION OF PETER SAUERWEIN IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS PLAINTIFFS'  
LONG-FORM COMPLAINT PURSUANT TO CALIFORNIA LAW Case No. 3:23-md-03084-CRB

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DECLARATION OF PETER SAUERWEIN IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS PLAINTIFFS'  
LONG-FORM COMPLAINT PURSUANT TO CALIFORNIA LAW

Case No. 3:23-md-03084-CRB

**DECLARATION OF PETER SAUERWEIN**

I, Peter Sauerwein, hereby declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and a resident of Seattle, Washington. I submit this declaration in support of Defendants Uber Technologies, Inc., Rasier LLC, and Rasier-CA LLC's (collectively "Uber") Motion to Dismiss Plaintiffs' Long-Form Complaint Pursuant to California Law (the "Motion"). I have personal knowledge of each fact stated in this declaration and, if called as a witness, I could and would competently and truthfully testify thereto. I am authorized to make these statements on behalf of Uber.

2. I am currently employed at Uber as the Senior Manager for Corporate Business Operations. Prior to my current role, I was employed by Uber from November 2016 through January 2021. I was first employed as an Operations and Logistics Manager in Denver, Colorado, from November 2016 through August 2018, and a Senior Operations and Logistics Manager in Denver, Colorado, from August 2018 through January 2019. In January 2019, I moved to San Francisco and became Head of Regulatory Strategy and Operations for the U.S. West region. Then, starting in November 2020, I was employed as Territory Lead for UberEats, and I remained in that role until I left the company in January 2021. I returned to Uber in April 2022 as the Senior Manager for Corporate Business Operations.

3. In my position at Uber, I have access to Uber's business records regarding users and independent drivers who use Uber's mobile application (the "Uber App") and the trips they made using Uber's software applications, and I have access to those records in the regular course of business.

**McKnight Settlement**

4. To date, Uber has identified 21 Plaintiffs who allege incidents in California, Florida, Illinois, New York, or Texas who released claims pursuant to the June 1, 2017 Settlement in the class action *McKnight v. Uber Technologies, Inc.*, No. 14-cv-05615 (N.D. Cal.).<sup>1</sup> Additional

<sup>1</sup> Those Plaintiffs are Jane Doe LS 98, 23-cv-05412; M.M., 24-cv-00299; Jane Doe LS 154, 23-cv-03807; Jane Doe 91, 23-cv-04368; Jane Doe LS 158, 23-cv-04385; Jane Doe LS 249, 23-cv-04369; Marquita Harris, 23-cv-05526; Sullivan, 23-cv-05418; Jane Doe LS 203, 23-cv-04371; Jane Doe LS 16, 23-cv-03758; Ashley Jones, 23-cv-03851; C.L., 23-cv-04972; Courtney Wilson, 24-cv-00203; C.O., 24-cv-00136; Jane Doe LS 159, 23-cv-04365; Mildred

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1 Plaintiffs who released their claims under the *McKnight* Settlement may be identified as discovery  
2 proceeds.

3 I declare under the penalty of perjury under the laws of the United States that the foregoing  
4 is true and correct.

5 Executed at Seattle, Washington, this 1st day of April, 2024.

DocuSigned by:



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PETER SAUERWEIN

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27 Hunter, 23-cv-05622; Jane Doe LS 177, 23-cv-05219; Jane Doe LS 388, 23-cv-05346; N.M., 23-cv-04940; A.R., 24-  
28 cv-01467; Jane Doe EB 1, 23-cv-05870. The 21 Plaintiffs were identified based on payments made to them under the  
*McKnight* Settlement Agreement, as well as records of their trips taken during the *McKnight* class period.

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DECLARATION OF PETER SAUERWEIN IN SUPPORT OF  
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